

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF COAST,  
INC.,  
PLANNED PARENTHOOD OF GREATER  
TEXAS, INC.,  
PLANNED PARENTHOOD SOUTH TEXAS,  
INC.,  
PLANNED PARENTHOOD CAMERON  
COUNTY, INC.,  
PLANNED PARENTHOOD SAN ANTONIO,  
INC.,

Defendants.

No. 2:21-cv-022-Z

Date: December 21, 2022

**APPENDIX B IN SUPPORT OF PLANNED PARENTHOOD FEDERATION OF  
AMERICA, INC.'S MEMORANDUM OF LAW IN SUPPORT OF ITS OPPOSITION  
TO TEXAS'S MOTION TO COMPEL**

# APPENDIX B

Priv Log #	Date	Author	Recipient(s)	Privilege Type	Privilege Description
PRIV-002291	5/7/2018	Hart, Kelly	Gottlieb, Kathryn*; White, Kasia; Limon-Mercado, Dyana; Gutierrez, Yvonne; Wiens-Talbert, Angie; Posada, Mara; Flaxman, Carrie*; Flood, Kristin*; Watson, Beth; Nguyen, Tram	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Kathryn Gottlieb, Esq., Carrie Flaxman, Esq., and Kristin Flood, Esq., regarding state regulatory compliance strategy.
PRIV-002296	10/19/2015	Gutierrez, Yvonne	Wheat, Sarah; Hart, Kelly; Wiens-Talbert, Angie; Tafolla, Rochelle; Estibaliz, Mara; Limon-Mercado, Dyana; Diaz, Alejandra; Wells, Danielle; Krasnoff, Helene*; Flaxman, Carrie*	Attorney Client Privilege	Confidential email providing legal advice from PPFA Legal Department regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002320	12/14/2020	Sandman, Jennifer*	Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002321	12/14/2020	Gottlieb, Kathryn*	Wheat, Sarah; Sandman, Jennifer*; Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; McKinney, Sheila; Barraza, Polin*; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002322	12/14/2020	Wheat, Sarah	Sandman, Jennifer*; Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002323	12/14/2020	Sandman, Jennifer*	Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Wheat, Sarah; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002339	12/11/2020	Hons, Jeffrey	Sandman, Jennifer*; Khan, Alyah; Wheat, Sarah; Hart, Kelly; Limon-Mercado, Dyana; Tafolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Johnson, Anjel; Posada, Mara; Posada; Ledoux, Abigail; Keiser, Autumn; McKinney, Sheila; Lambrecht, Ken; Linton, Melaney	Attorney Client Privilege	Confidential email providing legal advice from Kathryn Gottlieb, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002386	12/11/2020	Sandman, Jennifer*	Khan, Alyah; Wheat, Sarah; Hart, Kelly; Limon- Mercado, Dyana; Tafolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Johnson, Anjel; Posada, Mara; Ledoux, Abigail; Keiser, Autumn; McKinney, Sheila; Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney	Attorney Client Privilege	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002387	12/11/2020	Sandman, Jennifer*	Khan, Alyah; Wheat, Sarah; Hart, Kelly; Limon- Mercado, Dyana; Everett, Andrew; Tafolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Johnson, Anjel; Posada, Mara; Ledoux, Abigail; Keiser, Autumn; McKinney, Sheila; Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney	Attorney Client Privilege	Confidential email containing legal advice from in-house counsel Julie Murray, Esq. regarding affiliate communication strategy.
PRIV-002388	1/4/2021	Sandman, Jennifer*	Hons, Jeffrey; Lambrecht, Ken; McKinney, Sheila; Wiens-Talbert, Angie; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Linton, Melaney; Gottlieb, Kathryn*; Krasnoff, Helene*; Flaxman, Carrie*; Ledoux, Abigail; Khan, Alyah; Bajramovic, Hana	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding Medicaid.